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**UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**CONTRA PIRACY, a non-profit  
Association, organized and existing  
under the laws of Switzerland, and  
Assignee of the copyright in "All Things  
Fall Apart", a motion picture**  
**Plaintiff,**  
**v.**  
**DOES 1 – 2919,**  
**Defendants.**

Case No.: C13-1133 EDL

**NOTICE OF FILING OF  
DECLARATION IN RESPONSE TO  
COURT'S ORDER OF JUNE 21, 2013**

Attached here is the additional declaration in support of Plaintiff's Brief on Order to Show Cause Regarding Standing, in response to the Court's Order of June 21, 2013.

Respectfully submitted,

CONTRA PIRACY

**DATED:** June 24, 2013

By: /s/ Boden Davidson  
Boden Davidson, No. 266119

**NOTICE OF FILING OF DECLARATION IN RESPONSE TO COURT'S ORDER - Case No:  
C13-1133 EDL**

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7  
8 **UNITED STATES DISTRICT COURT FOR THE**  
9 **NORTHERN DISTRICT OF CALIFORNIA**  
10 **SAN FRANCISCO DIVISION**

11 **CONTRA PIRACY, a non-profit** )  
12 **Association organized and existing** )  
13 **under the laws of Switzerland, and** )  
14 **Assignee of the copyright in "All Things** )  
15 **Falls Apart", a motion picture** )  
16 **Plaintiff,** )  
17 **v.** )  
18 **DOES 1 – 2919,** )  
19 **Defendants.** )  
20

Case No.: C13-1133 EDL

**DECLARATION OF RICHARD M.  
SCHNEIDER IN FURTHER SUPPORT  
OF PLAINTIFF'S BRIEF ON ORDER  
TO SHOW CAUSE REGARDING  
STANDING**

21 **I, RICHARD M. SCHNEIDER, HEREBY DECLARE:**

- 22 1. I am over the age of 18 and am otherwise competent to make this declaration.  
23 2. This declaration is based on my personal knowledge and, if called upon to do so, I  
24 will testify that the facts stated herein are true and accurate.  
25 3. I submit this declaration in further support of Plaintiff's Brief on Order to Show  
26 Cause Regarding Standing.  
27 4. I am employed by Contra Piracy, an association organized and existing under the  
28 laws of Switzerland, with its principal address at Sennweidstrasse 45, 6312 Steinhausen,

DECLARATION IN SUPPORT OF PLAINTIFF'S BRIEF ON ORDER TO SHOW CAUSE -  
Case No: C13-1133 EDL

1 Switzerland.

2 5. Hannibal Inc. d/b/a Hannibal Pictures is the “de facto” owner of the copyright in  
3 “All Things Fall Apart” such that Hannibal Pictures was actually able to make an assignment of  
4 the rights to copy and to distribute the copyrighted work “All Things Fall Apart” via the  
5 P2P/BitTorrent protocol to Contra Piracy. Without the assignment of such rights to Contra Piracy,  
6 Hannibal Pictures is the sole, “de facto” owner of the copyright in “All Things Fall Apart”.

7 6. The legitimate commercial distribution of copyrighted works via the  
8 P2P/BitTorrent protocol is certainly viable in a technological sense, however the extent of  
9 legitimate commercial distribution via P2P/BitTorrent in a market sense is severely limited by  
10 the rampant, mass infringements of copyrighted works utilizing the P2P/BitTorrent protocol. The  
11 distributed nature of the P2P/BitTorrent protocol provides efficient and low-cost distribution of  
12 large digital media content files, abrogating the need for expensive centralized servers. The cost  
13 savings of P2P/BitTorrent distribution can enable companies and individuals to increase the  
14 dissemination of their copyrighted works and to pass the cost savings onto consumers in the form  
15 of lower prices. While P2P/BitTorrent is an attractive opportunity for the low-cost distribution of  
16 copyrighted works, it is exceedingly difficult to create a legitimate P2P/BitTorrent market in  
17 light of the overwhelming infringements utilizing the protocol, e.g. the unauthorized distribution  
18 of copyrighted works, for free. Lower prices in a legitimate P2P/BitTorrent market would be  
19 hard pressed to compete with the for free distribution in the immense black market, highlighting  
20 the need to sharply curb or eliminate the unauthorized copying and distribution of copyrighted  
21 works via the P2P/BitTorrent protocol.

22 **PURSUANT TO 28 U.S.C. § 1746**, I hereby declare under penalty of perjury under the  
23 laws of the United States of America that the foregoing is true and correct.

24 Executed on this 22nd day of June, 2013.

25  
26 **RICHARD M. SCHNEIDER**

27  
28 By:  \_\_\_\_\_

DECLARATION IN SUPPORT OF PLAINTIFF'S BRIEF ON ORDER TO SHOW CAUSE -  
Case No: C13-1133 EDL

**CERTIFICATE OF SERVICE**

I hereby certify that on June 24, 2013, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, and service is effectuated by transmission of Notices of Electronic Filing generated by CM/ECF to all counsel of record and pro per parties authorized by the Court to use CM/ECF.

By: /s/ Boden Davidson  
Boden N. Davidson, #266119